

EXHIBIT C

From: Larkin, Arthur (Law) <alarkin@law.nyc.gov>
Sent: Monday, April 07, 2014 1:05 PM
To: Katherine Rosenfeld; Joyce, Kimberly (Law)
Cc: Nguyen, Diep (Law); Nunez Plaintiffs' Counsel; Vasudah Talla
Subject: RE: 30(b)(6) on cameras

None of those dates work, unfortunately, so pick some dates after May 9th. We'd be willing to conduct this one deposition during the week of May 12th if your side wants to do so. Otherwise, pick some dates during the week of May 19th.

The self-serving characterizations in your message below are, as usual, both wrong and offensive.

Arthur G. Larkin, Esq.
Senior Counsel
NYC Law Department
100 Church St., Room 3-177
New York, New York 10007
(212) 356-2641 (tel.)
(212) 788-9776 (fax)

-----Original Message-----

From: Katie Rosenfeld [mailto:krosenfeld@ecbalaw.com]
Sent: Monday, April 07, 2014 12:56 PM
To: Larkin, Arthur (Law); Joyce, Kimberly (Law)
Cc: Nguyen, Diep (Law); 'NunezPlaintiffsCounsel@ropesgray.com'; Vasudha Talla
Subject: Re: 30(b)(6) on cameras

We object to your adjournment of this deposition for more than a month from when we are seeking to conduct it, based on the trial schedule of one attorney on your team.

Because you refuse to conduct the deposition in April on any of the dates we proposed and instead seek to delay it, please be advised that we can alternatively take Dr. Venters' deposition on May 1, 2, 5, 6 or 7.

Please advise promptly which of the above dates is confirmed. Thank you.

Katherine Rosenfeld
Emery Celli Brinckerhoff + Abady LLP

----- Original Message -----

From: Larkin, Arthur (Law) [mailto:alarkin@law.nyc.gov]
Sent: Monday, April 07, 2014 09:16 AM
To: Katie Rosenfeld; Joyce, Kimberly (Law) <kjoyce@law.nyc.gov>
Cc: Nguyen, Diep (Law) <dinguyen@law.nyc.gov>; 'NunezPlaintiffsCounsel@ropesgray.com' <NunezPlaintiffsCounsel@ropesgray.com>; Vasudha Talla
Subject: Re: 30(b)(6) on cameras

We have already asked you for May dates for Dr. Venters' deposition and we await your reply. We will get back to you with dates for the other witnesses.

Arthur Larkin
212-356-2641

----- Original Message -----

From: Katie Rosenfeld [mailto:krosenfeld@ecbalaw.com]
Sent: Monday, April 07, 2014 09:00 AM
To: Joyce, Kimberly (Law)
Cc: Nguyen, Diep (Law); Nunez Plaintiffs' Counsel (NunezPlaintiffsCounsel@ropesgray.com)
<NunezPlaintiffsCounsel@ropesgray.com>; Larkin, Arthur (Law); Vasudha Talla <vtalla@ecbalaw.com>
Subject: RE: 30(b)(6) on cameras

Dear Kim,

Can you please propose an April date for this 30(b)(6) deposition on cameras per my emails from last week? Arthur mentioned you would be scheduling it. Thank you.

Also, Kim and Arthur, I understand from Anna Friedberg that as of Friday, April 4, 2014, the City has now completed the ESI production for Dr. Homer Venters. Per my emails to Arthur last week on the subject, can you please propose an April date for his deposition as well?

We are anxious to move forward with completing these two depositions and appreciate your attention this. At this time, I can try to make most dates work that are convenient for the witnesses and counsel, with the exception of April 17 and 18th.

Thanks.

Katherine Rosenfeld
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-----Original Message-----

From: Katie Rosenfeld

Sent: Wednesday, April 02, 2014 8:52 PM

To: Joyce, Kimberly (Law)

Cc: Nguyen, Diep (Law); Nunez Plaintiffs' Counsel (NunezPlaintiffsCounsel@ropesgray.com); Larkin, Arthur (Law); Vasudha Talla

Subject: RE: 30(b)(6) on cameras

Kim- any update on a date for this deposition? Thanks.

From: Katie Rosenfeld

Sent: Tuesday, April 01, 2014 3:15 PM

To: Joyce, Kimberly (Law)

Cc: Nguyen, Diep (Law); Nunez Plaintiffs' Counsel (NunezPlaintiffsCounsel@ropesgray.com); Katie Rosenfeld; Larkin, Arthur (Law); Vasudha Talla

Subject: 30(b)(6) on cameras

Kim, Please let me know a good date for this 30(b)(6) on cameras to proceed for you and the deponent(s). I'm still available April 8, 9, 14, and 15, and if none of those work, perhaps you can propose the alternative that does work on your end. Thanks.

Katherine Rosenfeld

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